



Kevin Musiakiewicz, Partner
📞 862.902.5460 ✉️ kevin@ck-litigation.com

January 29, 2025

Via CM/ECF

The Honorable Julien X. Neals, U.S.D.J.
U.S. District Court, District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Request for Court's Approval of Proposed Briefing Schedule
Baucum v. Rutgers Univ., RWJBarnabas Health, and Jersey City Med. Ctr.
Civil Action No. 2:23-cv-20707-JXN-JSA

Dear Judge Neals:

This firm represents Defendant Rutgers, The State University of New Jersey. We write in conjunction with the attorneys for Plaintiff James Baucum, D.O. and Defendants RWJBarnabas Health and Jersey City Medical Center, in response to the Court's Text Order dated January 23, 2025 [D.E. 45] directing Defendants to proceed with motions to dismiss Plaintiff's amended complaint. The attorneys for all parties to this action have conferred and agreed upon the following briefing schedule for the motions to dismiss:

1. Moving papers: March 7, 2025
2. Opposition: April 14, 2025
3. Replies: May 2, 2025

If this proposed schedule is acceptable to the Court, we respectfully request that it be "so-ordered." We greatly appreciate the Court's time and consideration.

Respectfully submitted,

/s/ Kevin J. Musiakiewicz
Kevin J. Musiakiewicz, Esq.

cc: All Counsel of Record (via CM/ECF)